

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
)	
Modernizing the E-rate)	WC Docket No. 13-184
Program for Schools and Libraries)	
)	

COMMENTS OF
THE SCHOOL DISTRICT OF PHILADELPHIA
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING
FCC 13-100

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I. Introduction

The School District of Philadelphia (“SDP”) is the eighth largest school district in the nation, by enrollment. With approximately 137,000 students attending District-managed schools and another 55,000 students in public charter schools directly authorized by the SDP, the SDP is the largest school district in the Commonwealth of Pennsylvania.

The SDP is a separate and independent home rule school district of the first class, established in the Philadelphia Home Rule Charter under the First Class City Public Education Home Rule Act P.L.643. A five-member School Reform Commission (SRC) established by the Pennsylvania Legislature in December 2001 under Act 46 of the PA School Code, currently governs the SDP. The SRC exercises all powers and has all duties of the Board of Education that previously had oversight of the SDP prior to 2001.

The SDP provides a full range of education services contemplated by statute. These include general, special and vocational education at the elementary and secondary levels, as well as related supportive services. Preschool services are also provided in response to the needs of the community. The SDP employs approximately 20,000 employees at over 250 schools, administrative sites, regional offices and bus fleet garages.

II. Summary

The School District of Philadelphia (“SDP”) welcomes the opportunity to submit these initial comments in response to the FCC’s Notice of Proposed Rulemaking (“NPRM”) released June 23, 2013 (FCC 13-100) “Modernizing the E-rate Program for Schools and Libraries” ¹

This Notice of Proposed Rulemaking seeks comment on several E-rate program reforms and SDP is focusing its comments on specific areas that would greatly impact our District, our schools and all of the Philadelphia public school students for which we have been charged with providing an instructionally sound, technologically innovative and safe learning environment. The SDP would also like to note its membership in the newly-formed E-rate Reform Coalition due to our strong desire to have open discussion on various ways in which program modifications might yield the availability of additional funding for all program beneficiaries, and help to ensure the future sustainability of the E-rate support mechanism.

SDP asserts that the existing E-rate program framework is solid, and modest but thoughtful changes can be made to modernize the eligibility list and provide flexibility to applicants. Many applicants across the U.S. have relied heavily on the E-rate support mechanism for the past sixteen

¹ See Notice of Proposed Rulemaking released on July 23, 2013, FCC 13-100

years to successfully construct technology infrastructure and to bring essential telecommunications and Internet services into classrooms, as the program's visionaries had originally conceived. At the inception of the program, SDP had a mere seven schools with dedicated low-speed Internet connections, each school having only six identified rooms sharing that access. The 270+ remaining school facilities relied solely on dialup remote access to the Internet for selected teachers within each building. Less than 30% of classrooms had operable telephones and even less had reliable access to broadband video, all resulting in what were essentially dozens of "isolated" learning spaces under a single roof.

By contrast, SDP has received funding commitments in excess of \$310 million since 1998, to successfully retrofit approximately 280 school buildings with voice, video and data infrastructure, and to fund needed telecommunications and Internet services. As of this date, every SDP classroom, school office and collaborative learning space has access to high-speed wired and wireless (WiFi) Internet access, a functioning telephone, high-bandwidth connections to the commodity Internet, Internet II and regional networks, and adequate support and maintenance to keep those services running properly, in order that teachers can focus on their mission of educating students.

The SDP greatly applauds the work of the FCC and their support of the E-rate program, without which our students, 82% of which come from economically disadvantaged homes, wouldn't have equitable access to these fundamentally necessary and empowering services in a 21st century classroom.

The SDP has been a successful participant in the E-rate program since its inception, and we believe that we've utilized program funding to make sound and strategic technological investments that will scale well as bandwidth and connectivity needs escalate in the future. SDP represented large and urban school districts on behalf of the Council of the Great City Schools in USAC's 2003 Waste, Fraud and Abuse Task Force. SDP has hosted several U.S. congressional staffers, as well as members of the FCC and GAO over the past decade, in an attempt to share lessons learned and to provide feedback in order to make a great program even better.

The NPRM seeks comment on a very broad and wide-ranging set of possible program modifications and funding formula changes. And while there has even been some discussion of a complete transformation of the existing program framework, the SDP would like to caution that many schools and libraries have built successful broadband environments and strategies, and that future program changes must be sensitive to allowing those institutions to continue to support their already successful programs. While certain eligibility and rule modifications will, in our opinion, help to build a stronger and more solvent E-rate program and assist those schools and libraries that have had challenges in building their broadband infrastructure, those changes should

not “transform” the program at the consequence and expense of those who have already managed to “do it well.”

The SDP has had direct exposure to and has assisted many types of schools and applicants including libraries, public charter, parochial and private schools, and has observed a commonality that we believe the FCC may be able to address in order to assist certain entities in becoming successful with the E-rate program specifically, and their technology strategy generally. Notwithstanding the geographic unavailability of advanced telecommunications services or extreme budgetary constraints that some entities are confronting, it is the observation of SDP that technical expertise and experience is a large factor that keeps many applicants from realizing the benefits of the E-rate program, and from developing a sound, cost-effective roadmap for implementing broadband in the classroom or library. The specific type of technical knowledge and expertise often needed to navigate the waters of choosing the smartest type of broadband service, wiring classrooms, selecting networking hardware and formulating service and maintenance contracts, is not a strength inherently available to most smaller, rural and isolated schools, libraries and even small school districts. Of the many reforms now under consideration for E-rate 2.0, simplifying the application and receipt of funds and generally finding ways to make more funding available, are necessary goals. However, these reforms in and of themselves won’t magically boost broadband presence in schools that have failed to successfully benefit from the last sixteen years of the E-rate program. Rather, a combination of streamlining the existing program framework in concert with an available pool of technical resources, infrastructure best practices and web-based collaborative spaces, would hit at the heart of those entities that are still struggling with the basics of where to begin in building out their technology environment.

III. Reply Comments

NPRM, ¶24

The Commission is seeking comment on setting minimal levels of broadband speed necessary to meet the proposed goal, and what those levels should be.

SDP thinks the Commission should set bandwidth goals but allow individual schools, school districts and libraries to determine what levels are adequate for their learning environments and instructional models. Attaching an arbitrary bandwidth requirement per student would result in overestimating need for some entities and perhaps lowering the bar of connectivity for others – the latter possibly resulting in denied funding requests where bandwidth needs are arbitrarily judged as excessive. In contrast, encouraging every school and library to “achieve” a certain baseline of bandwidth may unnecessarily drive funding demand and result in vastly underused infrastructure.

Rather, the SDP would propose that the FCC set forth examples or general guidelines for bandwidth for various types of school technology models, prospectively tied to the ratio of the number of students per computing device. Alternately stated, the SDP supports bandwidth goals with the understanding that each school and library will have varying capacity needs that will evolve over time. SDP believes that the E-rate program should support those needs, to the extent that the applicant is making reasonable use of that bandwidth.

NPRM, ¶80

The Commission seeks comment on whether there are circumstances under which it will be more cost-effective for schools and libraries to build or purchase their own Wide Area Network (WAN) rather than to lease a WAN.

SDP would support a proposal to allow schools and libraries to build or purchase their own WANs. In so much as applicants can demonstrate, as in through the competitive process, that purchasing WAN infrastructure is a more strategic and cost-effective solution for current and future bandwidth needs, the SDP supports this concept. SDP has witnessed firsthand that metropolitan, suburban and even certain rural areas, lend themselves to circumstances or local regulations that would permit the cost-reasonable purchase of fiber-optic infrastructure. Entities could see positive return on that investment in future years as bandwidth needs expand, and newer and cheaper end-point electronics allow even more capacity to be derived from those same fiber backbones. SDP would suggest that certain parameters be established surrounding the purchase and use of WAN infrastructure to prevent possible waste and/or abuse – such parameters might include amortization of upfront costs over multiple years for the purchase of expensive fiber-optics and

rights-of-way, a maintenance support plan and certain restrictions on excess fiber-optic capacity that can be funded upfront through the program.

NPRM, ¶85

The Commission asked if there are any services not currently receiving support that would allow more cost effective use of E-rate funds? Are there other equipment or services necessary for high-capacity broadband connections that should qualify for prioritized support?

SDP would strongly endorse the addition of Internet filtering and proxy equipment, and by extension, applicant-owned firewall and security equipment to the Eligible Services framework. Aside from the established and legally mandated requirements of CIPA, it is a fiduciary and essential responsibility of schools and school districts to protect its students and families to the practical extent possible, from exposure to inappropriate and high-risk Internet content. SDP has found that many commercial service providers are unable or unwilling to provide those types of services at the provider layer, especially to the scale required for the real-time needs of our 250 buildings. The acquisition and support of these types of filtering and security hardware has become essential to the “basic conduit access” that carries bandwidth to/from the classroom, yet this equipment remains ineligible for support. What SDP has witnessed firsthand, is the costly correlation between increasingly inexpensive Internet bandwidth and the incremental increase in costs of filtering and proxy technology that is needed to process that bandwidth in real-time. If for no other reason than the CIPA mandate itself, the SDP strongly advocates that filtering and related services and equipment become eligible for program support.

NPRM, ¶97

The Commission seeks comment on phasing out E-rate support for services that are not directly related to connectivity, such as electronic mail services (e-mail) service and web hosting.

SDP would support phasing out these services from the ESL. Tangential services such as e-mail and web hosting, while critical to the function of a modern school or library, are not fundamental to the equipment or services needed to bring communications and broadband into the classroom. With the advent of Web 2.0 and the many social networking tools now available, it is impractical to define precisely what an “e-mail hosting” or “web hosting” service actually is under the existing Eligible Services framework. Many service providers that are receiving E-rate funding for e-mail or web hosting, offer blended solutions to the extent that cost allocation has become

hypothetical at best, and in many cases badly abused. Many e-mail and collaboration services are now freely available, especially for the K-12 and education market, from larger providers such as Google and Microsoft.

NPRM, ¶101

The Commission seeks comment on phasing out funding for Basic Maintenance of Internal Connections (BMIC).

SDP strongly opposes this proposal. BMIC is integral to the continued, reliable operation of E-rate funded telecommunications equipment - equipment that is crucial to delivering broadband to the classroom. SDP asserts that the elimination of BMIC would encourage applicants to replace equipment more frequently, thus driving up the demand for Internal Connections. The elimination of BMIC penalizes applicants who have thoughtfully planned out their infrastructure and services through the benefit of the E-rate program over the past 16 years, and who depend on BMIC funding to keep that infrastructure functioning. In absence of BMIC, the SDP would have insufficient funding to properly maintain the LAN's and communications equipment that are critical to the operation and instruction of over 10,000 classrooms and learning areas. In contrast, the SDP opines that schools and libraries must have solid technical support and maintenance plans and processes to ensure that equipment and broadband services that are subject to E-rate support remain functional to the benefit of all students and teachers. For many entities such as SDP, BMIC funding has become foundational to ensuring the success of the E-rate support mechanism in schools.

NPRM, ¶104

The Commission seeks comment on SECA's recent proposal to streamline priority two services. SECA suggests that priority two eligible services should be limited to routers, up to one per building; wireless access points, up to one per classroom for schools; and internal cabling, up to three cabling drops per classroom for schools.²

SDP strongly opposes this proposal and concept. It is neither realistic nor sensible to place cookie-cutter limitations for equipment or services on schools that have varying infrastructure demands. As a large urban school district that has worked closely for many years with public charter schools, public libraries, Diocesan schools, and privately run schools, we've witnessed technology models that range anywhere from small distributed computing clusters in each

² See Letter from Gary Rawson, State E-rate Coordinators' Alliance, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 02-6, at 6 (filed Jun. 24, 2013) (attaching SECA's "Recommendations for E-rate Reform 2.0") (SECA June 2013 White Paper).

classroom, to having all computers located in highly concentrated labs, to completely 1:1 wireless learning models – each appropriate for their specific teaching and learning model. In schools with high concentrations of wireless devices, for example, it would be entirely appropriate to cluster wireless access points to accommodate needed WiFi density in certain rooms or learning spaces. There is no single or “right” model for building and supporting infrastructure in schools or libraries, and therefore no practicality in attempting to define “standard” priority two equipment types and quantities for each building or classroom.

NPRM, ¶108

The Commission asks about the potential hardship districts would face if voice phone service was phased out.

SDP strongly opposes any proposal to phase out or eliminate the eligibility of voice services. The telephony infrastructure in all SDP schools was designed around current E-rate program rules and eligibility framework and the elimination of voice telephone service as an eligible service would be of great hardship and would pose a direct risk to the safety and security of students and teachers. Traditional voice service, whether delivered as an analog or digital service, is a proven, reliable and cost-effective solution for bringing telephony services to schools and classrooms. Prior to the introduction of the E-rate program, less than 30% of SDP classrooms had functioning voice service. SDP took advantage of E-rate funding to construct and greatly expand voice services to the classroom, inclusive of the purchase and installation of PBX systems and related equipment. These systems also utilize basic maintenance funding through the program to ensure that district-wide voice services remain functional and reliable. At the time of implementation, voice installations used Category 3 (CAT.3) cabling to extend analog voice services into all classrooms and learning spaces, as part of a holistic solution for delivering voice, video and data communications to teachers and students. For SDP schools to take advantage of newer VOIP technology, for example, would require the rewiring of entire schools, the purchase of new voice communications systems, and end-user equipment - which even if financially feasible, would require large future demands for priority two services. SDP has found that even the largest telecommunications carriers in Philadelphia still can not deliver VOIP-based telephony to buildings and/or directly to classrooms in a more cost-favorable manner than traditional analog or PRI-based services.

SDP does not have the funding or resources to rewire hundreds of school buildings for newer, VOIP-based communications services and should not be penalized or placed at risk, simply because they chose the most cost-effective solution for delivering voice, video and data services to the classroom. Loss of E-rate support for basic voice services and systems will in many cases, result

in the need to discontinue those services or face increasing loss of functionality as systems fall to disrepair - a situation that directly impacts the life and safety of students, teachers and support staff in our schools and classrooms. A safe classroom should continue to be considered integral, immediate, and proximate to the education of students.

NPRM, ¶111

The Commission seeks comment on the time frame for phasing out support for certain types of services.

SDP respectfully requests that any major changes to eligibility support or “phase out” not take effect until at least Funding Year 2017. For many schools and libraries, the Funding Year 2014 competitive bidding process is already underway. Any abrupt changes could have disastrous financial implications for schools and libraries working under dire budgetary constraints such as the SDP, in addition to the loss of critical telecommunications and Internet services. SDP can’t emphasize enough that many districts, school and libraries have invested over a decade of resources and E-rate program support to construct infrastructure, supports and to frame contracts specifically around the existing Eligibility Services framework. Elimination of the eligibility of any type of equipment or service will require beneficiaries to rethink how they are offering services, and to facilitate careful planning as to how they will cope in the absence of some services that will no longer be affordable, as well as to terminate existing multi-year contracts. Alternatively stated, larger districts such as SDP can not easily or quickly “reinvent” their technology infrastructure and services for which they’ve spent the last 16 years building as a result of their success under the current E-rate program.

NPRM, ¶145

The Commission seeks comment on SECA’s recent suggestion to rescind the two-in-five rule.

SDP supports the SECA recommendation to rescind the two-in-five rule for internal connections. Since its introduction, this rule has created additional confusion and a significant burden on applicants, especially those districts centrally managing priority two implementations for hundreds of schools. As an unintended consequence, this rule prevents applicants with large numbers of entities from purchasing even the most modest “shared” priority two equipment, such as an eligible district-wide network server, without accruing a strike against all of its entities in a single program year. There is little evidence to show that the two-in-five rule has had the intended impact, and SDP believes that there are a number of other reforms currently under consideration that would address repeated “excessive” expenditures by applicants.

NPRM, ¶146

The Commission seeks comment on eliminating the distinction between priority one and priority two services.

SDP wholeheartedly supports this proposal. There exists a great disparity between schools and libraries that have already met broadband goals and those who have not. Allowing applicants to prioritize their funding requests based on their individual technology needs would enable applicants – especially school districts – to provide more equitable services across their districts. Even districts with high aggregate discounts have schools that fall below the 80% discount threshold that have not received priority two funding in many years. Candidly, many applicants gave up applying for these sites long ago. Prioritizing funding to only broadband equipment and services penalizes applicants who have thoughtfully planned out their infrastructure and services through the benefit of the E-rate program over the past 16 years. SDP has witnessed entities elsewhere in Philadelphia who have specifically oriented their technology solutions towards a spectrum of “managed services” under the priority one tier, regardless of their cost-effectiveness. SDP applauds allowing all entities to have equal access to priority one and priority two services in pursuit of implementing the best and most cost-favorable solution for delivering high quality voice, video and data services to the classroom.

NPRM, ¶200

The Commission seeks comment on whether we should direct USAC to employ a team of technical experts who could assist applicants in planning and designing cost-effective networks?

SDP strongly supports the concept of having USAC, perhaps in partnership with other vendor-neutral entity(ies), provide technical expertise and assistance to applicants in need of guidance or planning in the development and support of their broadband infrastructure. Notwithstanding the geographic unavailability of advanced telecommunications services or extreme budgetary constraints that some entities are confronted with, it is the observation of SDP that technical leadership is by far the largest hurdle that has kept many applicants from realizing the benefits of the E-rate program, and from developing a sound, cost-effective roadmap for implementing broadband in the classroom. While SDP has witnessed some very knowledgeable and forward-thinking instructional technology leaders and administrators, their focus tends to be on the pedagogy, and the integration of technology-based tools into the academic program. However, the technical expertise often needed to navigate the waters of choosing the smartest type

of broadband service, wiring classrooms, selecting networking hardware and formulating service and maintenance contracts, is not a strength inherently available to most smaller, rural and isolated schools, libraries and even school districts. Of the many reforms now under consideration for E-rate 2.0, simplifying the application and receipt of funds and generally finding ways to make more funding available, are necessary goals. However, these reforms in and of themselves won't magically boost broadband presence in schools that have failed to successfully benefit from the last sixteen years of the E-rate program. Rather, a combination of streamlining the existing program framework in concert with an available pool of technical resources, infrastructure best practices and web-based collaborative spaces, would hit at the heart of those entities that are still struggling with the basics of where to begin in building out their technology environment.

NPRM, ¶201

The Commission seeks comment on whether there are other entities other than the Commission that could perform this function.

SDP believes that the FCC should look to forge or encourage stronger partnerships with existing non-profit, vendor-neutral entities such as the Consortium for School Networking (CoSN) or the International Society for Technology in Education (ISTE) in an effort to establish a resource support mechanism for entities in need of technical guidance. Through USAC's existing outreach function, SDP would encourage facilitating proposals and ideas for partnership opportunities and further believes that a modest investment in funding support in this area would yield large positive returns for enabling all schools and libraries to realize the introduction of broadband into their respective environments.

NPRM, ¶227

The Commission seeks comment on the proposal to require all E-rate applicants and service providers to file all documents, including the FCC Form 500, with USAC electronically and to require USAC to make all notifications electronically.

SDP supports this proposal. A centralized portal would be a valuable tool for all schools and libraries, especially those that experience frequent staff turn-over as it relates to E-rate responsibilities. The benefits derived from an investment in USAC's technology systems to bring everything "online" would far outweigh initial upfront costs.

NPRM, ¶236

The Commission seeks comment on setting timeframes for resolution of applications and

release of funding commitments and adopting a deadline by which USAC must act?

SDP fully supports the SECA proposal that, absent an active criminal investigation in which the party is the subject, within ninety (90) days of the lack of activity on an FCC Form 471 application or invoice, USAC should notify all affected parties of concerns that are holding up a decision on the application and submit detailed requests for any additional documentation or information as part of the notification³. SDP has witnessed firsthand, and believes that there is no single more important factor in enabling applicants to correctly and successfully utilize E-rate funding, than to ensure the timely and expedient review and award of application requests. Applicants that are heavily reliant on recurring E-rate funding, especially for priority one services, can ill-afford to have funding awards delayed or delivered months into a funding year, or worse, after the conclusion of the funding year. Similarly, in the instance of priority two services, applicants must usually align their requests for support, with other external budgetary sources including operating, capital or categorical grant awards. Any delay of funding awards that extend into a given program year, can often result in reduced levels of services, underutilized and wasted commitments, duplicative funding requests in subsequent years, and a complete spectrum of compliance issues related to contract extensions, modifications and product substitutions.

NPRM, ¶237

The Commission seeks comment on whether to limit the number of opportunities and length of time that applicants have to submit complete information to USAC in response to USAC's requests.

SDP strongly disagrees with this proposal. With the goal of assisting more entities to successfully navigate and benefit from the E-rate program, we must refrain from inserting further barriers, especially those such as this that would directly affect novice applicants and those with scarce technical resources or transient technology staff. It is rare that applicants are assigned the same PIA reviewer for multiple successive program years, thus with each new funding year applicants must regurgitate the same information on the same funding requests – it often takes multiple exchanges for a newly assigned reviewer to fully understand the applicant's specific situation. Most importantly, school district administrative and technology staff that have been charged with managing the E-rate process typically do not have the benefit of dedicating 100% of their time and resources to E-rate and PIA review. Rather, their primary concern lies with the smooth and successful operation of schools in their district. Respectfully stated, school calendars are sometimes an afterthought when E-rate program deadlines are set. Additionally, given that

³ SECA August 2011 White Paper at 5.

there is often a single key person responsible for E-rate related inquiries, scheduled and unscheduled absences or unforeseen events can unintentionally extend the time necessary for proper follow up from the applicant's point of contact. SDP asserts that the primary issue regarding the PIA review process is that applicants often cannot obtain an actual status on their application review – sometimes being left in “PIA limbo” for months at a time – with little more information than an on-line status indicator of “Initial Review”.

NPRM, ¶241

The Commission seeks comment on the proposed rule language regarding multi-year contracts and filing a single Form 471.

SDP proposes the rule language be modified to increase the term of the contract (including extensions) from three to five years, at minimum. SDP would support a proposal wherein the initial year of a multi-year contract undergo a more vigorous review given the remaining years are funded without duplicative review of identical information. However, SDP would suggest a Form 471 still be filed every year for services covered under multi-year contracts. Allowing multi-year Form 471s could lead to error and confusion on the part of the applicant with varying contracts having different end dates.

IV. Conclusion

FCC Chairman Reed Hundt announced from a small classroom in a South Philadelphia middle school in September 1997, his challenge to FCC members to ensure the success and longevity of the Universal Service schools and libraries discount program. He was quoted as saying, "Modern communications is on the verge of bringing the often lost and isolated world of elementary and secondary school education into the modern age...now your purpose here at the USAC is to raise the money to make this new Philadelphia freedom available to every child in every classroom in every county in every corner of the country."

The School District of Philadelphia and its students, teachers and community, have benefitted greatly from the FCC's vision in 1996, of expanding the Universal Service Support Mechanism to “wire classrooms” and to assist in leveling the field for access to technology and broadband services in all classrooms and libraries across the Nation. E-rate 1.0 created a support mechanism and funding distribution formula that prioritized resources towards our most economically-challenged and technologically-starved schools and neighborhoods, be they in the

most rural portions of our geography or the most concentrated urban cities.

We are pleased that the Commission is taking this opportunity to review and reassess the program as a whole, and to invite comments from stakeholders on how to improve an already greatly successful program. We do believe that program modifications that would streamline, expedite and more readily make funds available to applicants in furtherance of their goals and support for broadband use in the classroom, is both welcome and prudent. However, we also note that there has been public discussion of using the E-rate 2.0 initiative to completely rebuild and reimagine the Universal Support structure for schools and libraries to address what statistically is viewed as many schools still not having the adequate broadband resources and infrastructure to support 21st century instructional models. We reject any notion that the program has significantly failed in its original mission to support the Nation's classrooms, but rather assert that with careful and specific changes to the current program implementation, E-rate 2.0 can greatly expand its reach and effectiveness in our schools and libraries, and move all classrooms towards the bold vision of President Obama's recently announced ConnectED initiative.

At the same time, we implore the FCC to recognize that many schools, school districts and libraries throughout the U.S. have constructed broadband and technology ecosystems that are heavily dependent upon sustained E-rate funding and the current eligibility framework. We ask that the FCC be sensitive to the scarce financial and staffing resources that are available in many of our disadvantaged schools and districts such as Philadelphia, when rewriting the rules and regulations or changing the funding distribution formulas of the program. Our goal of bringing more of our Nation's schools, libraries and students into the era of high-capacity broadband access, should not be at the peril, detriment or risk, to the large portion of schools and communities that have successfully commandeered E-rate 1.0 to provide their students with equitable and universal access to those resources.

Respectfully submitted,

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